

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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IN RE: *

* CASE NO. N/A

PVO 18 USC 793, 1519, 2071 *

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Grand Jury 22-6

United States District Courthouse
333 Constitution Avenue, NW
Washington, DC 20001

Thursday, December 22, 2022


The testimony of TIMOTHY PARLATORE was taken in
the presence of a full quorum of the Grand Jury, commencing
at 9:20 a.m., before:

JULIE EDELSTEIN
Attorney, Department of Justice

BRETT REYNOLDS
Attorney, Department of Justice

ANNE McNAMARA
Assistant United States Attorney

Digitally reported by:

 Grand Jury Court Reporter

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1 A. Sure. And so generally speaking, you know, I
2 represent him, you know, related to, you know, various
3 matters, including, you know, DOJ probes, you know, January
4 6th probe, you know, this one, you know, some other, you
5 know, things. But I am primarily a criminal defense
6 attorney. I do do civil litigation as well. But I'm not a
7 political attorney, if that's what you're wondering. So I'm
8 not doing any election stuff.

9 Q. So we are not seeking today to elicit from you
10 privileged information.

11 A. Okay.

12 Q. But should you say that any information is
13 privileged, I will ask you what privilege and the basis for
14 the invocation.

15 A. Sure.

16 Q. Do you understand?

17 A. Absolutely.

18 Q. When did you become involved in this matter?

19 A. As to the compliance with the subpoena?

20 Q. So more broadly speaking with it, with the
21 investigation into the potential mishandling of classified
22 information at Mar-a-Lago and other locations?

23 A. In which capacity? And I apologize for asking.
24 The -- because it is kind of a weird situation --

25 Q. So let me --

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1 something that's helpful, I can't.

2 Q. A couple questions --

3 A. It's privileged.

4 Q. -- on that.

5 WITNESS: Which is something that she knows.

6 If -- it's something that every --

7 BY MS. EDELSTEIN:

8 Q. Is there a limitation --

9 WITNESS: -- attorney --

10 BY MS. EDELSTEIN:

11 Q. -- on --

12 WITNESS: It's something that every attorney does
13 know.

14 Q. Is there a limitation that, for the communication
15 to be attorney/client privilege, it must for the purpose of
16 asking legal advice?

17 A. Any information obtained from a client is part of,
18 you know, legal advice or representation. Yes.

19 Q. And are you aware that a client can waive that?

20 A. I am aware that a client can waive that.

21 Q. And if the former President's so cooperative, why
22 hasn't he allowed you to share his conversations with the
23 Grand Jury today?

24 A. Are you -- are we really doing this?

25 Q. I'm -- I asked you a question.

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1 A. Are you --

2 Q. You must made a representation --

3 A. Well --

4 Q. -- about a conversation --

5 A. Hold on a second. Hold on.

6 Q. -- that occurred, and you said that the former
7 President --

8 A. Hold on.

9 Q. -- offered --

10 A. Are you saying --

11 Q. -- anything you want.

12 A. Are you saying that for --

13 Q. And I --

14 A. -- somebody to be cooperative, they're required to
15 waive their attorney/client privilege?

16 Q. I am absolutely not saying that. I'm just asking
17 you --

18 A. Okay.

19 Q. -- on this --

20 A. Because the --

21 Q. -- point --

22 A. -- the question you just asked seemed to indicate
23 that for somebody to be cooperative, they should waive their
24 attorney/client privilege, which is absolutely wrong --

25 Q. I'm not here to --

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1 A. -- for you to suggest.

2 Q. -- induce any waivers --

3 A. Right?

4 Q. -- of attorney/client privilege.

5 A. Do you understand --

6 Q. You just --

7 A. -- that that's not something that should be even
8 suggested --

9 Q. I understand --

10 MR. REYNOLDS: Sir, you're the witness today.

11 BY MS. EDELSTEIN:

12 Q. -- my legal obligations. You're the witness
13 today, and I've asked you a question --

14 A. Well, you -- but that's an --

15 Q. -- you made a representation --

16 A. -- improper question.

17 Q. -- to this Grand Jury about what was said at a
18 meeting. And I asked you the basis for that representation.

19 A. That's an improper question. You can't ask me
20 what the President said to me. You don't -- there's --

21 Q. Then who --

22 A. -- no --

23 Q. -- told you that?

24 A. There's no privilege waiver. There were other
25 people in the room.

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1 kept you a long day, so we really appreciate it.

2 MR. REYNOLDS: Thank you.

3 WITNESS: And thank you. And I apologize if some
4 of the answers were a little bit more convoluted just
5 because of the weird dynamic here, but I appreciate your
6 time. Thank you.

7 (Whereupon, the witness was excused at 3:22 p.m.
8 on December 22, 2022.)
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